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13 RAMESH "SUNNY" BALWANI

14 UNITED STATES DISTRICT COURT
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16 NORTHERN DISTRICT OF CALIFORNIA
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18 SAN JOSE DIVISION
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20 UNITED STATES OF AMERICA,
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22 Plaintiff,
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24 v.
25
26 RAMESH "SUNNY" BALWANI,
27
28 Defendant.

Case No. 18-CR-00258-EJD

**DECLARATION OF JEFFREY B.
COOPERSMITH RE: DEFENDANT
RAMESH BALWANI'S MOTION TO
EXCLUDE TRIAL EXHIBIT 2931**

Judge: Honorable Edward J. Davila

DECLARATION OF JEFFREY B. COOPERSMITH

I, Jeffrey B. Coopersmith, declare as follows:

1. I am lead counsel for defendant Ramesh “Sunny” Balwani, an attorney admitted to practice in the State of California, a partner at the law firm of Orrick, Herrington & Sutcliffe LLP, and counsel of record for Mr. Balwani. I submit this declaration in support of Mr. Balwani’s motion to exclude Trial Exhibit 2931 (“TX2931”).

2. Attached as **Exhibit 1** is a true and correct copy of TX2931, a series of emails between Erika Cheung and Gary Yamamoto between September 19, 2015 and October 29, 2015, redacted to protect personal identifying information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed March 21, 2022 at San Jose, California.

/s/ Jeffrey B. Coopersmith
JEFFREY B. COOPERSMITH